

Limited English Proficiency (LEP) Access Plan Improving Access to Services for Persons with Limited English Proficiency



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Introduction

This Limited English Proficiency (LEP) Plan has been prepared to address CyRide's (dba Ames Transit Agency, an agency of the City of Ames) responsibilities as a recipient of federal financial assistance for the operation of its public transit system, as they relate to the needs of individuals with limited English language skills. The plan has been prepared in accordance with Title VI of the Civil Rights Act of 1964 which prohibits discrimination on the basis of race, color or national origin in programs and activities receiving Federal financial assistance. Executive Order 13166, titled Improving Access to Services for Persons with Limited English Proficiency, indicates that differing treatment based upon a person's inability to speak, read, write or understands English is a type of national origin discrimination. It directs each federal agency to publish guidance for its respective recipients clarifying their obligation to ensure that such discrimination does not take place. This order applies to all state and local agencies which receive federal funds, including CyRide which receives federal assistance through the U.S. Department of Transportation (U.S. DOT), Iowa Department of Transportation and Federal Transit Administration.

CyRide is committed to ensuring that no person is excluded from participation in or denied of its transit services on the basis of race, color, or national origin. This plan was developed to guide CyRide in its administration and management of LEP related activities.

Plan Summary

CyRide, the public transit operator in Ames, Iowa, has developed this Limited English Proficiency Plan to help identify reasonable steps for providing language assistance to persons that are limited English proficient (LEP) who wish to access services provided by the transit agency. As defined in Executive Order 13166, LEP persons are those who do not speak English as their primary language and have limited ability to read, speak, write or understand English.

This plan outlines how to identify a person who may need language assistance, the ways in which assistance may be provided, staff training that may be required, and how to notify LEP persons that assistance is available. In order to prepare this plan, CyRide utilized information obtained from the Four-Factor Analysis to determine the specific language services that are appropriate to provide. The Four Factor Analysis is an individualized assessment that balances the following four factors:

1. The number or proportion of LEP persons in the service area who may be served or are likely to be served by CyRide.
2. The frequency with which LEP persons come in contact with CyRide's services.
3. The nature and importance of CyRide's services, programs or activities to the LEP population.
4. The resources available to CyRide for LEP outreach, as well as the costs associated with that outreach.

A summary of the results of CyRide's four-factor analysis is in the following section.

Four Factor Analysis

1) Number of LEP Persons Served

How LEP persons interact with CyRide

LEP persons interact with CyRide similar to the general public in accessing our public transit services by:

- Riding the bus & interacting with CyRide driver
- Calling or emailing CyRide staff for assistance
- Walk-in customers at CyRide (pass sales, lost-n-found, etc)
- Public meetings and hearings
- Meetings with local human service agencies
- Acquiring schedule information via brochure, website, phone or texting
- Lodging a concern/complaint or commendation to CyRide
- Taking a survey dispersed by CyRide
- Requesting additional transit service (hours/frequency/locations) in Ames
- Requesting/Riding Dial-A-Ride services (ADA Paratransit service)

Identification of LEP communities, and assessing the number or proportion of LEP persons from each language group to determine the appropriate language services for each language group

Ames Community Survey (ACS) U.S. Census Data

CyRide serves the entire Ames general public. CyRide has identified the LEP communities, and assessed the number or proportion of LEP persons from each language group to determine the appropriate language services for each language group. CyRide attained this information from the American Community Survey (ACS) data from the US Census information. Within the American Community Survey, there are currently 5-year estimates for “Languages Spoken at Home By Ability to Speak English for the Population 5 years and Over.” (According to the ACS, the 5-year data is the most precise data of the 1-year, 3-year, 5-year estimates. http://www.census.gov/acs/www/guidance_for_data_users/estimates/) The total population over 5 years of age within Ames is **58,791**.

The ACS classified persons speaking a language other than English in their homes and if they spoke English “very well” or “less than very well.” Those individuals that speak English “less than very well” are classified as Limited English Proficient persons according to [FTA C 4702.1B](#). Table 1 shows the languages spoken at home for all persons five years old and older, with number and percentage of persons broken out by language within the CyRide service area.

Table 1: City of Ames Limited English Proficiency (LEP) Individuals

Language	Speak language at home	Margin of Error	Speak English "very well"	Margin of Error	Speak English less than "very well"	Margin of Error	Percentage speaking English less than very well
Total Population > 5 Years of Age	58,791	+/-204	1,072	+/-254			
Speak only English	51,457	+/-661	98	+/-51			
Spanish or Spanish Creole:	1,267	+/-289	0	+/-22	195	+/-133	0.3%
French (incl. Patois, Cajun):	132	+/-61	36	+/-41	34	+/-33	0.1%
French Creole:	0	+/-22	177	+/-163	0	+/-22	0.0%
Italian:	36	+/-41	169	+/-78	0	+/-22	0.0%
Portuguese or Portuguese Creole:	184	+/-164	3	+/-5	7	+/-12	0.0%
German:	198	+/-86	10	+/-16	29	+/-34	0.0%
Yiddish:	3	+/-5	28	+/-45	0	+/-22	0.0%
Other West Germanic languages:	10	+/-16	14	+/-16	0	+/-22	0.0%
Scandinavian languages:	28	+/-45	164	+/-155	0	+/-22	0.0%
Greek:	14	+/-16	0	+/-22	0	+/-22	0.0%
Russian:	191	+/-158	77	+/-80	27	+/-33	0.0%
Polish:	0	+/-22	171	+/-235	0	+/-22	0.0%
Serbo-Croatian:	84	+/-83	0	+/-22	7	+/-11	0.0%
Other Slavic languages:	171	+/-235	20	+/-24	0	+/-22	0.0%
Armenian:	0	+/-22	0	+/-22	0	+/-22	0.0%
Persian:	41	+/-35	190	+/-162	21	+/-25	0.0%
Gujarati:	50	+/-74	0	+/-22	50	+/-74	0.1%
Hindi:	198	+/-158	297	+/-187	8	+/-13	0.0%
Urdu:	0	+/-22	12	+/-19	0	+/-22	0.0%
Other Indic languages:	321	+/-192	986	+/-329	24	+/-28	0.0%
Other Indo-European languages:	32	+/-38	31	+/-54	20	+/-31	0.0%
Chinese:	2,444	+/-463	47	+/-56	1,458	+/-352	2.5%
Japanese:	40	+/-56	0	+/-22	9	+/-15	0.0%
Korean:	315	+/-204	0	+/-22	268	+/-190	0.5%
Mon-Khmer, Cambodian:	0	+/-22	17	+/-18	0	+/-22	0.0%
Hmong:	0	+/-22	9	+/-15	0	+/-22	0.0%
Thai:	17	+/-18	32	+/-35	0	+/-22	0.0%
Laotian:	40	+/-47	398	+/-200	31	+/-34	0.1%
Vietnamese:	86	+/-63	102	+/-71	54	+/-51	0.1%
Other Asian languages:	475	+/-226	67	+/-57	77	+/-64	0.1%
Tagalog:	102	+/-71	0	+/-22	0	+/-22	0.0%
Other Pacific Island languages:	301	+/-189	0	+/-22	234	+/-179	0.4%
Navajo:	0	+/-22	24	+/-37	0	+/-22	0.0%
Other Native North American languages:	18	+/-27	237	+/-160	18	+/-27	0.0%
Hungarian:	24	+/-37	0	+/-22	0	+/-22	0.0%
Arabic:	389	+/-252	123	+/-77	152	+/-212	0.3%
Hebrew:	0	+/-22	0	+/-22	0	+/-22	0.0%
African languages:	123	+/-77	1,072	+/-254	0	+/-22	0.0%
Other and unspecified languages:	0	+/-22	98	+/-51	0	+/-22	0.0%

Source: 2010-2014 American Community Survey 5-year Estimates for the City of

Ames: http://factfinder2.census.gov/faces/tableservices/jsf/pages/productview.xhtml?pid=ACS_11_5YR_B16001&prodType=t

[able](#)

The Department of Justice defines the Safe Harbor threshold as 1,000 persons OR 5% of the total population in the Ames community, whichever is less, for vital document translation. As shown in the table on the previous page, Chinese is the only language spoken in Ames are over 1,000 persons or meet 5% of the total population for speaking English less than very well. The next highest language speaking English less than very well in Ames are Korean (268 or 0.5%) and Spanish (195 or 0.3%).

LEP persons are those persons living in the United States regardless of whether they are a citizen of the United States. According to the Ames Community Survey information, international students attending Iowa State University (major University in the City of Ames) are part of the Census figures if they are living in Ames for the majority of the year. CyRide and several City of Ames' departments made a concerted effort within the Census 2010 data-gathering process to ensure participation specifically from CyRide bus riders, including limited-English proficient persons. City staff, including CyRide, personally distributed the 2010 Census forms to persons boarding at bus stops along high-capacity corridors that CyRide considers "minority routes" and where LEP as well as low-income populations would most likely reside. Therefore, city staff did its due diligence to try and attain the best 2010 Census information possible.

The table below speaks to the ability of Asian to speak English and how they rate their ability. Most rate their ability to speak English as “very well” or “well”. This is important as CyRide decides spend its budget on documents that likely won’t impact an LEP populations ability to have meaningful access to public transit.

Table 2: NATIVITY BY LANGUAGE SPOKEN AT HOME BY ABILITY TO SPEAK ENGLISH FOR THE POPULATION 5 YEARS AND OVER

	NATIVE		FOREIGN		TOTAL	
	Estimate	Margin of Error	Estimate	Margin of Error	Estimate	Margin of Error
	51,648	+/-512	7,143	+/-472	58,791	+/-472
Speak only English	49,884	+/-596	1,573	+/-319	51,457	+/-319
Speak Spanish:	1,000	+/-265	267	+/-150	1,267	+/-150
Speak English "very well"	929	+/-252	143	+/-85	1,072	+/-85
Speak English "well"	0	+/-22	80	+/-73	80	+/-73
Speak English "not well"	64	+/-61	30	+/-45	94	+/-45
Speak English "not at all"	7	+/-13	14	+/-19	21	+/-19
Speak other Indo-European languages:	394	+/-128	1,299	+/-403	1,693	+/-403
Speak English "very well"	364	+/-130	1,102	+/-396	1,466	+/-396
Speak English "well"	27	+/-32	130	+/-67	157	+/-67
Speak English "not well"	3	+/-5	67	+/-76	70	+/-76
Speak English "not at all"	0	+/-22	0	+/-22	0	+/-22
Speak Asian and Pacific Island languages:	289	+/-151	3,531	+/-375	3,820	+/-375
Speak English "very well"	276	+/-151	1,413	+/-292	1,689	+/-292
Speak English "well"	13	+/-23	1,759	+/-336	1,772	+/-336
Speak English "not well"	0	+/-22	290	+/-109	290	+/-109
Speak English "not at all"	0	+/-22	69	+/-62	69	+/-62
Speak other languages:	81	+/-43	473	+/-265	554	+/-265
Speak English "very well"	77	+/-43	307	+/-171	384	+/-171
Speak English "well"	4	+/-9	166	+/-215	170	+/-215
Speak English "not well"	0	+/-22	0	+/-22	0	+/-22
Speak English "not at all"	0	+/-22	0	+/-22	0	+/-22

Source: U.S. Census Bureau, 2010-2014 American Community Survey 5-Year Estimates

Source: 2010-2014 American Community Survey 5-year Estimates for the City of

Ames: http://factfinder.census.gov/faces/tableservices/jsf/pages/productview.xhtml?pid=ACS_14_5YR_B16005&prodType=table

School K-12 Data

During CyRide's April 2011 Title VI review conducted by FTA it was noted by the review team that they believed Ames to have a visible non-ISU student Asian presence. They indicated that this presence would be seen in the large presence of LEP students in the Kindergarten through Twelfth grade schools.

As a result CyRide contacted the Ames' Community School District's (ACSC) [Alternative Learning Program](#) Director in the fall 2016. One of the many programs within the ALP is to provide "English as a Second Language" (ESL) to "English Language Learners" (ELLs) with language and cultural instruction to increase academic achievement and social development. The ALP Director provided that the ACSD works with approximately **140 students**, Kindergarten through 12th grade, for those in the English as a Second Language Program.

However, the APL Director could not provide specific languages spoken for these **140 students**. He indicated that this data was not available. The APL Director shared that students' typically need translation mainly from English to Korean or Spanish with "some" translation to the Chinese language and that many teachers utilize their own personal iPhone and translate through an App to translate to students. However, he indicated this translation is not a requirement for the staff nor does the district provide these phones. He indicated that the numbers of English Language Learners (ELLs) are relatively small for the Ames metropolitan area compared to the Des Moines area for instance. Overall, there are five different ESL teachers within the Ames' district – three to share among the five Elementary schools, one at Middle School and one at High School.

Even if all 140 ELL students were Chinese and both parents were LEP, this is only 420 LEP Chinese families for the Ames area. Based on conversations with the ALP Director, there are several languages represented within the 140 students involved in the ALP program. Furthermore, the APL Director indicated that not all 140 students have two-parent families and some LEP students may just have one LEP parent with the other speaking, reading, writing English very well.

He indicated that having one LEP parent brings some students difficulty as they develop their own English language. He also relayed that parents are often affiliated with Iowa State University either as a student, faculty/staff or researcher and outreach to the university would be the best way to reach these families. Based on only 140 English Language Learners (ELLs) in the entire Ames school district, **CyRide asserts that their initial assertion is correct that there is NOT a strong non-ISU student LEP population.**

Therefore, CyRide still believes that most of the Chinese LEP population is derived from International students attending Iowa State University as opposed to families which the Title VI review team indicated from their three days visiting the Ames' community.

This assertion can be further illustrated by the [ACS's Demographic Estimates 2007-2009](#) of the Chinese race population of 2,464 verses Iowa State University's reported International Chinese students of 1,849. Based on this information, only 615 are non-international

Chinese residents living in Ames of which many could be spouses, grandparents, parents or other relatives, including K-12 children, which Chinese ISU students bring with them to the United States as they study at ISU.

CyRide also requested whether there were any formalized group meetings for these students or families of the ESL students to actively involve these students' families in participating with CyRide's transportation planning process. The APL Director disregarded the question but indicated that the ESL participation was small compared to other metropolitan areas. He also elaborated on how extremely transient this group of English Language Learners (ELLs) are in a university community. He stated that every six months the language climate can change as students come and go frequently. Specifically, he noted that a K-12 student's family left Ames, abruptly switching colleges from Iowa State to Texas. As a result three ELLs students left their program. He indicated that this happens quite frequently in this "town and gown" community. Therefore, CyRide staff noted that no formalized LEP groups for parents exist within the school system per his response.

Concentrations of LEP Persons or LEP Communities

Steps were then taken to identify any concentrations of LEP persons in Ames, which the following information summarizes.

City of Ames LEP Groups

No known formalized LEP groups organized through the City of Ames at this time. However, Ames does have an Ames Human Relations Commission that works to minimize or eliminate discriminatory practices. Individuals can file a complaint if they believe they are a victim of discrimination or contact the City Manager's Office. In discussions with the Assistant City Manager no instances of language barriers have occurred in the past year with any city departments. When instances do occur, individuals generally speak Spanish or a Chinese dialect to the recollection of the Asst. City Manager and Customer Service Department. According to the City of Ames' Assistant Manager, LEP persons often, without any request from the City, bring an English speaking adult with them to discuss their issues with city staff. Additionally, the City Clerk can also access interpreters if needed and has a list available upon request. Lastly, any city staff can contact an over the phone interpreter, the Big Word, to help staff communicate with any person having Limited English Proficiency. This guidance and procedures are located on the front page of all City of Ames' internal phone books.

University Minority/International Enrollment

Since many individuals from other countries around the world seek higher education after high school by attending Iowa State University (ISU), identifying the majority of the individuals listed in the US Census that also attend ISU was the next logical step. The following table is minority information from Iowa State University's Office of the Registrar attending ISU for the past four years. Note that the International students are not broken out by a specific minority group. ISU's Office of the Registrar indicated they track the international students by the country the student is from but not by ethnicity/minority group. In addition, they do not provide/track languages spoken by any student enrolled at Iowa State University. As of the fall 2012, Iowa State University does not track languages spoken by ISU students or whether they speak English very well at this time. Fall 2012 statistics indicates the highest International population of students ever from over 100 foreign countries.

Table 2: Iowa State University Minority Enrollment

	American Indian/ Alaskan Native	Black	Asian	Native Hawaiian or Other Pacific	Hispanic/ Latino of any race	Two or more races	Inter-national	TOTAL
Fall 2006	76	696	809		573	n/a	2,113	4,267
Fall 2007	81	740	777		622	n/a	2,244	4,464
Fall 2008	85	746	803		683	n/a	2,497	4,814
Fall 2009	66	735	791	7	770	163	3,017	5,749
Fall 2010	65	721	756		832	241	3,327	5,942
Fall 2011	58	787	768	15	993	339	3,424	6,369
Fall 2012	61	788	801	25	1,134	446	3,510	6,740
Average 10-12	61	765	808	20	986	342	2,913	6,350

Source: [ISU's Office of the Registrar Enrollment Statistics](#)

Note: International not available via minority breakdown

The Office of Registrar representative suggested contacting the [Intensive English and Orientation Program](#) (IEOP) in Ames and they may have data on their students' language spoken at home. Below explains IEOP and its function.

Intensive English and Orientation Program

The [Intensive English and Orientation Program](#) (IEOP) purpose is to immerse students in spoken and written American English and the cultural environment in the United States. The curriculum emphasizes the academic skills necessary for international students to be successful in their undergraduate or graduate studies in the U.S. These skills include reading efficiently, writing clearly, taking notes from lectures, participating in classroom discussions (seminar skills) and communicating with people on and off campus.

“IEOP is a self-supported, full-time program in spoken and written American English, emphasizing the language skills that non-native English speakers will need for successful study at the college level in the United States.”

International students attending ISU are required to have knowledge of English as a second language to be successful at Iowa State University. Iowa State University “requires” all international students whose country’s “official” language is other than English (or those that request English assistance), to complete a Test of English as a Foreign Language (TOEFL) exam prior to enrollment to Iowa State University. If International students “**pass the TOEFL**”, they can enroll in Iowa State University classes. However even through students pass the TOEFL, this ability to read, write or speak the English may be less than “very well.” In other cases, students may read/write English very well but perhaps not speak the language as well and

therefore be LEP according to the IEOP representative. In addition, the University's International Student Organization (ISO) representative relayed that many students write/read better in English than students born in the United States. However, they indicated that speaking the language is more difficult.

If International students “fail the TOEFL”, they can enroll into the [Intensive English and Orientation Program](#) to learn the English language. After each semester in IEOP, the student will take the TOEFL exam again. Once a student fails the TOEFL twice, the student's name is provided to the International Student Organization and their VISA to remain in the United States would be revoked. IEOP considers all students enrolled in the IEOP program limited English speaking therefore all IEOP students are thereby considered LEP. IEOP applicants are required to have a high school education level, or its equivalent, as well as a basic level of English ability. IEOP staff is not versed in other languages but English.

According to an IEOP representative, there were **90 students** (0.3%) enrolled in IEOP in the fall semester of 31,040 total ISU students. IEOP does not obtain their language most often spoken but does track their countries similar to the same policy as Iowa State University. The 90 students enrolled were from the following countries: China - People's Republic, China - Taiwan, Colombia, France, Iraq, Japan, Jordan, S. Korea, Saudi Arabia, and Singapore.

An IEOP representative indicated that most of these students speak Chinese and spend on average 1.6 semesters in the IEOP program at six different levels. The IEOP program prepares students to handle university course work. IEOP staff indicates that students must understand English at a “very well” level in order to be able to participate and pass university classes. They also indicate that students come knowing some English from their homeland. IEOP indicates that they are being more selective upon which students they do allow into the program (those that speak better English) to ensure more students pass the TOEFL exam and move onto studies at ISU. According to the [IEOP Student Handbook](#):

- IEOP students must attend class over 90% of the time to receive a recommendation for admission to ISU as well as pass the TOEFL exam.
- IEOP students falling below 75% in classroom attendance, the IEOP director MUST report the student to the office of International Students and Scholars (ISS) and then ISS will inform Immigration that the student is out-of-status and is in violation of his/her F-1 Immigration status. (See [IEOP Student Handbook](#))
- IEOP students who receive two consecutive failings of the TOEFL will not be allowed to enroll again in IEOP.
- No ISU university classes may be taken while students are enrolled in IEOP but IEOP students can access ISU student amenities (Rec Center, CyRide, etc.) just like another other student at ISU.

IEOP staff indicates that IEOP students utilize CyRide frequently and has requested that their building housing the IEOP department be added to CyRide's route map beginning with the summer 2014. IEOP conducts an orientation session each session that includes how to ride CyRide and get around the Ames community.

IEOP acknowledged that students enrolled in IEOP are NOT allowed to speak native languages in their classrooms and must speak English only. They are also now requiring a higher TOEFL score between 517 and 527 points, attend 90% of their IEOP classes and have 18 class performance points in all their IEOP classes to be recommended into Iowa State University. They also indicated that many international students rely on each other particularly those with the same native languages to become fluent in the English language. Furthermore, they relayed that many international students bring translation devices within them to translate information knowing that language will be somewhat of a barrier. When discussing this “very well” term with the IEOP representative, they indicated that IEOP students would understand the English language “very well” by the time they move on to university studies. Not understanding English would set them up for failure in their ISU university coursework in whatever major they determined. IEOP also let CyRide know that they do not provide any translation services written or verbal to the international population as it is a requirement for international students to learn English to begin studies at Iowa State University.

The next section discusses CyRide’s outreach to other community organizations within the Ames community that work with the LEP population and provide essential services (food, shelter, clothing) for residents.

Community Organizations

Story County Human Services Council (30+ members) - CyRide continues to reach out to Ames/Story County human service agencies as well as Iowa State organizations that work with individuals that may be limited English proficient (LEP) through the Story County Human Services Council, of over 30 members. This organization consists of organizations representing transportation providers, school systems, youth organizations, health organizations, community organizations, state/city governments, religious organizations and legal aid entities. The HSC meets monthly between September and May of each year. CyRide learned of the [Engaging International Spouses](#) organized by the YWCA through this group. CyRide met with this group on November 16th, 2011 at the International Women’s Festival for International ISU Spouses hosted at the Ames Public Library. The SCHSC group continues to be a good way to search out LEP outreach opportunities for CyRide however none of the agencies retain statistics on the number of LEP individuals they provide services.

United Way of Story County’s Transportation Collaboration Committee (UWSC TCC) – CyRide works with the United Way of Story County’s TCC group consisting of transportation providers and human service agencies to work toward bringing down the barriers to transportation service throughout Story County. Last year, CyRide approached this group to see if limited English proficiency (LEP) was an issue with their clients in accessing transit services. Most groups indicated that transportation was something clients had figured out by the time they reached their basic human need services (food and childcare). As part of this discussion,

agency representatives indicated that providing a method for staff to utilize CyRide's website in alternative languages as agency staff helped their clients in their transportation would be useful. Therefore, CyRide added Google Translate to its website as an option for those wanting to obtain CyRide information in alternative languages. Agency staff indicated they could print of the schedule for the individual speaking the alternative language if they did not have internet access.

International Students & Scholars (ISS) – CyRide provides information to all new students, living in the United States and abroad, arriving for orientation off and on over the past decade. CyRide has also provided orientation services directly to the International Students and Scholars (ISS) Organization upon request as they do for all organizations that request how to ride information. CyRide meets with ISS staff to discuss issues with new international students arriving in Ames prior to their housing being available. Transportation to/from hotels situated on the east side of Ames was discussed as transit is limited to this area. CyRide provided additional trips along the route to provide enough service to these individuals while in temporary hotel accommodations during the fall 2011. In addition, CyRide also discussed being part of the ISS Orientation process again and the ISS indicated they would contact CyRide to make arrangements in the future semesters. CyRide will meet with this group periodically as needs for the International community continues.

Asian Church – CyRide hired a Chinese intern to begin performing some additional outreach to Asian churches in the Ames community. We performed a quick survey of Chinese [Next Bus](#) users following the deployment of that new program. CyRide obtained a total of 16 surveys and found no issues with accessing the real-time service.

The operator surveys indicate that LEP persons are well served by the recipient and do utilize CyRide to find out where they want to go within the Ames community.

The literacy skills of LEP populations in their native languages, in order to determine whether translation of documents will be an effective practice.

CyRide contacted Mid-Iowa Community Action (MICA)'s director that works with a majority of the impoverished community and those that need basic services throughout Central Iowa to discuss the LEP clients they serve in Ames. Traditionally MICA serves children and families in poverty throughout Central Iowa serving LEP individuals speaking Spanish, Chinese of many dialects and Arabic/Turkish. They indicate that they struggle with the language barrier having nearly 40 instances daily with a wide range of languages/dialects. As of this time, MICA does not have an interpreter that they utilize but rely on the clients to bring an adult interpreter they trust as the most economical option. MICA is fortunate to have a Spanish speaking employee within the dental clinic they can utilize if necessary. They noted that many families do not have childcare or food services but have a good understanding of the transportation resources provided by CyRide by the time they visit MICA. She also indicated that LEP individuals differ in range of understanding between a 3rd

to a 9th grade level signifying that flyers/brochures need to be offered more simplistically for that 3rd grade level mentality. Again, this is not really an issue with the English language versus their preferred native language but an education level. For instance, the Director mentioned that flyers/brochures may not be understood even if provided in the LEP person's native language as the person cannot decipher their native written language. It was also indicated to CyRide that others may understand spoken/verbal English really well but may not read the written flyers/brochures – lacking the ability to just read English. MICA indicated the ability to access information from CyRide's website, translate it with a drop down button and print off this information is now extremely helpful when providing public transit information to their clientele. CyRide also asked whether the DVD's illustrating "[How to Ride CyRide](#)" and "[How to Read a Schedule](#)" were useful to MICA's clientele. MICA staff indicated that not many requests were made for this information. But, MICA did note that other human services agencies have the DVD's in their waiting areas for clients' information that may be useful. Again, MICA indicated that transit questions are extremely infrequent as this information has already been attained by the individual.

Whether LEP persons are underserved by the recipient due to the language barriers.

CyRide finds that LEP persons are not underserved by CyRide due to the language barriers and find that these persons are provided with meaningful access to CyRide's programs and services. This is evidenced by a January 2011 CyRide employee survey where questions were asked to attain a better understand LEP frequency of contact among CyRide's services. After reviewing the survey results, staff felt that this survey was reflecting contact with minorities rather than limited English speaking individuals. However, over 90% of drivers indicated that LEP persons rode CyRide everyday or a few times a week. This survey also indicated that drivers have direct communications with LEP persons 22% everyday, 38% a few times a week, and 29% a few times a month. CyRide senior staff felt this may be a little biased as drivers may look at the passenger and feel they are LEP when they may understand English very well. The drivers' survey is just their perception of the experience and may not reflect the true English proficiency of the passengers. Over 97% of drivers then communicated that an LEP person's questions are always or are sometimes answered by the drivers' communications. CyRide staff will re-administer the survey in the 2014 spring meeting refining the questions to obtain a better understanding and confidence in this survey's results.

2) LEP Persons' Frequency of Contact

CyRide began tracking contact with LEP individuals via a LEP log listing in November 2010 for those instances where supervisors are either called out to assist LEP passengers as requested by the bus driver or confusion is indicated over the phone with customer service staff due to a language barrier. Overall, there have been nineteen tracked instances (5 via phone; 4 on the bus; 2 at CyRide office, 8 public meeting) of contact with LEP individuals over the past year. Those languages encountered were Mandarin Chinese, Russian, Bosnian, Sign Language or

undetermined. This illustrates a relatively small frequency of contact as far as “confusion or issues” in communicating with LEP individuals. CyRide will continue to remind Operations staff to log their contact with LEP persons at their monthly staff meeting with a continual reminder on the agenda.

CyRide acknowledges very frequent contact with the International student community that ride the bus that may be LEP. This is illustrated by just hoping on a CyRide bus and listening to the languages spoken in the community. IEOP indicated that all IEOP students ride CyRide of which are all LEP. However, this contact may just be riding the bus on a daily basis and if no issues arise, then no log is taken on the LEP log. CyRide also acknowledges that there may be instances on the bus where drivers are not able to understand customer’s requests riding our services. Drivers are instructed to pull out a map and utilize the visual map to communicate on where passengers want to go via CyRide. The discussion is pointing to the map saying that “We are here” and then asking them to point where they want to go. The driver would give the number and color of bus with the next times to leave. Numbers are the same in any language. Any language barrier instances are not documented by the driver as incidents because the driver will call a supervisor for help if unable to communicate quickly with a passenger as a supervisor would have more time to communicate with the individual and call the language line for assistance if an interpreter is necessary. At CyRide, incident reports are documented any time there is a conflict issue with passengers or if there is a belief that an accident occurred either on/off the bus. Again, any instances of contact between LEP individuals and supervisors are recorded in the LEP contact log. Since October 2010, there has been only one instance where CyRide utilized the language assistance line.

All interactions with LEP persons are documented within the LEP log. CyRide’s planner documented within the LEP log those three visually impaired individuals that attended CyRide’s Proposed Fare Increase/Service Reduction Public Meeting on September 1, 2011. CyRide became aware of their visual disability after noticing there were issues in signing in their name to the sign-in sheet that they attended the meeting. This reference of attendees allowed CyRide to contact individuals when/if there were additional public input meetings about this issue. More attention was taken by CyRide to describe services verbally during that meeting as a result. These three individuals all communicated verbally during the meeting of their concerns which were documented for CyRide Transit Board. These attendees were accommodated by giving them a ride home after the meeting.

Most individuals that CyRide struggles with in their communications are those with disabilities but not from lack of a language barrier. Generally, these individuals require additional time in that they may not understand CyRide’s policies/procedures entirely or just need more information about changes occurring to CyRide’s routing. Language doesn’t seem to be a barrier to this group and view CyRide as their ride to independently travel throughout Ames. In April 2009, CyRide attended The Arc’s People First meeting, which is a group of disabled individuals and spoke about upcoming policy/schedule/route changes. The Arc of Story County Director is party of the Story County Human Service Council where CyRide discusses all of their upcoming changes. CyRide contacted the Arc of Story County Director in the August 2013

asking whether they would like another People First meeting in the future.

In the spring driver meeting for January 2011, CyRide performed a Limited English Proficient CyRide Survey, which was designed to better understand LEP frequency of contact among CyRide's services. After reviewing the survey results, staff felt that this survey was reflecting contact with minorities rather than limited English speaking individuals. Over 90% of drivers indicated that LEP persons rode CyRide everyday or a few times a week. However, it is more likely that many Asian minorities speak their native language on the bus rather than English. Staff felt the survey was misleading in that drivers related many Asian minorities as being limited English speaking just because they speak their native tongue on the bus, which is not valid. The quantitative number CyRide was trying to determine how many times drivers are having "issues" or "concerns" communicating with individuals on a daily basis to the point that they need to call out a supervisor for additional resources. This survey indicated that drivers have direct communications with LEP persons 22% everyday, 38% a few times a week, and 29% a few times a month. CyRide staff will re-administer the survey in the 2014 spring meeting refining the questions to obtain a better understanding and confidence in this survey's results.

Based upon the above recollection of past contact with LEP persons and the LEP log, CyRide assessed the frequency that staff and drivers have, or could have, contact with LEP persons. Therefore although minimal contact has been made in the past per the LEP log, this table represents the frequency that LEP persons "could have" contact with primary touch points. The following "touch points" and frequencies have been identified on the following page:

PRIMARY TOUCHPOINTS		FREQUENCY
Bus – No communication made with Driver	Buses are noted with number and color to identify each route.	Frequently
Bus – Communication made with Driver	Buses are noted with number and color to identify each route.	Occasionally
Customer Service Interactions – How to Ride Lost & Found items Next Available Bus Fares Etc.	Phone calls are made to CyRide requesting information. CyRide Total # of all calls: ◆ 15-35 calls/hour on weekends ◆ < 100 calls before 8am ; 150 -200 calls/ hour weekdays 8am-9pm; <100 calls after 9pm	Occasionally
Emails To CyRide	Email requests submitted to CyRide	Occasionally
System Route Map/Timetables	Printed/Website Bus Information	Frequently
Supervisors	On-route assistance to drivers/passengers; employees that provide assistance and may pick up passenger along certain route sections to keep buses on-time	Occasionally
DAR reservationists (ADA Services)	Heartland Senior Services staff	Frequently
Fare Information or Purchase of Passes/Tickets	Most of CyRide passengers have free access with ISU ID card; but information is critical to ride; majority purchase passes 1-2 times/year as opposed to daily tickets or cash	Occasionally
Bus Stop signs	Route numbers and colors designate specific route for CyRide.	Frequently
Website (Detours, What's New Information)	www.cyride.com	Frequently
Title VI Complaints	No complaints since the last submission.	Occasionally
Public meetings and hearings		

3) Nature and Importance of Services

Transportation is vital to any person accessing services throughout Ames if they are transit dependent. CyRide believes that the LEP population within Ames is derived partly from the international community of which generally does not bring automobiles to the United States. Therefore; unless they have friends with a vehicle, they rely on CyRide for all of their

transportation needs while studying at Iowa State University. Based upon communication with the IEOP office, international students in general do not have access to a vehicle and their primary source of transportation while in Ames is CyRide. IEOP staff indicated that international students rely either on friends or CyRide to transport them. Therefore transportation is critical to travel to Ames from Des Moines as well throughout the Ames community once they've arrived. CyRide does not provide transit services outside of Ames at this time. Transportation for minority persons from the Des Moines airport to Ames can be accomplished via a private transportation provider, Executive Express. Executive Express is a service that operates 14 times a day 365 days a year between the Des Moines International Airport and Ames, Iowa. Once individuals are in Ames, CyRide is the main source of transportation for international students. Many limited English persons may also be low-income and reliant on the bus even if they are residents of the United States and therefore transportation is critical for these persons

CyRide believes its vital or critical services are:

Critical Service	Explanation	Importance
Schedule/Timetable	Map, Routes, Timetables (Available via print or website)	Extremely Important
Detours	Changes to routing or bus stop closures (Available via website, closed stops & temporary bus stops)	Extremely Important
What's New	Changes to CyRide's policy, new service route, events, public meetings, etc	Very Important
Fares	How much to ride CyRide	Very Important Students ride free with ISU ID; Ames community would need this information though
Pass Sales Outlets	Where to obtain passes/tickets.	Very Important
ADA Brochure	Complimentary ADA Service (Available via print or website)	Very Important
ADA Application Form	How to apply for complimentary ADA Service	Very Important
Title VI Complaint	Ability to file Civil Rights complaints with CyRide, FTA or City.	Very Important – this should be available in English and Mandarin Chinese
Bus Signage	How to exit bus, pull bell cord, and other information displayed on buses	Extremely Important - this should be available in English and Mandarin Chinese

CyRide currently does not provide any emergency evacuation instructions within vehicles or shelters at this time. CyRide is available to the city if emergency situations do arise and evacuations are necessary. In these instances, the evacuation is being coordinated by other agencies throughout the city and CyRide is a resource to them. CyRide evacuated individuals due to the 2010 flood from certain residential housing and transported them to safe locations determined by the City. Again, CyRide did not lead this emergency evacuation and City staff was coordinating the evacuations. CyRide just provided buses/drivers to accommodate the evacuation.

CyRide typically posts any detours or alerts on its website but these are typically not critical issues. The passenger may be late to work/class as a consequence if a detour is missed by LEP individuals. However, a missed trip due to a detour may be enough for a LEP person to not try CyRide's services in the future. CyRide posts all detours on CyRide's website with a verbal description of the detour along with a map, Facebook and Twitter. In addition, information is posted at every bus stop in English and temporary stops are placed along the route detour if needed.

4) Resources Available for LEP outreach & Costs

CyRide has the following resources available to them enabling the transit organization to reach out to Limited English Proficient persons in the Ames area at a low/reasonable cost with just staff time for coordination involved.

- **Documents/Public meetings notices** (free) - When documents are prepared or public meetings are scheduled for which the target audience is expected to include LEP individuals, then documents, meeting notices, flyers will be published on CyRide's website in which Google Translate would have translated the materials into the preferred language of choice. CyRide will add to public meeting announcements that interpretive services are available upon request to CyRide by calling 292-1100 at least 72 hours prior to the meeting for arrangements to be made. CyRide will also publish vital documents on the website in word, if possible, as translations would not be possible through this digital format. The majority of contact with CyRide is through their website due to the highly educated ISU student population, therefore it is most important to have all critical service materials on the web. To substantiate, the Census indicates that 83.8% of the Ames population 25 years or older have a college degree or some college experience with 12.5% graduating high school. Only 3.7% of the Ames population over 25 years of age has less than a high school diploma. Of course the remaining 31,040 students attending ISU in the fall 2012 that are under 25 years of age are attending college for a higher education and websites are their main source of information and often socializing.
- **International Student & Scholars** (free) - CyRide will work with the University's International Student & Scholars (ISS) each fall and spring for incoming ISU students and will offer our services at their orientation sessions on "How to Ride CyRide" for these

students and their families. This organization works with various student cultural organizations to disseminate information for different nationalities. CyRide will communicate this orientation with other human service agency providers representing the local LEP constituency for this training. CyRide would work with ISS for translators, upon request, at these meetings.

- **Intensive English & Orientation Program/Office of Registrar (free)**- CyRide will continue to make connections and work with the Office of the Registrar and IEOP to see if additional information can be isolated to account for the number and proportion of LEP persons attending Iowa State University and how to best help these individuals access CyRide's services. This effort is needed particularly to document the rapidly growing concentration of the Chinese speaking population. CyRide is unaware of any specific LEP groups in Ames not related with the university to contact other than the human service agencies.
- **Human/Health Service Agencies** - CyRide currently networks with local human service organizations through the Story County's Human Service Council and United Way's Transportation Collaboration Committee that provides services to LEP individuals and seeks opportunities to provide information on transit services. CyRide will survey these organizations periodically to determine if the LEP population has difficulty in accessing CyRide's service from their perspective
- **Community Partners (City/University/GSB)** - As CyRide is governed by the City of Ames, Iowa State University (ISU) and the ISU's Government of the Student Body, CyRide will utilize these connections to network and search out other limited English speaking groups they may communicate with in their endeavors. These organizations may also have resources to translate materials into alternative languages.
- **Interpreter Services (\$0.82/minute)** – CyRide now has a contractual relationship with “CTS Language Link” who is a 24/7/365 Telephone Interpreting service. This service supports over 240 languages and has telephone interpreters available 24 hours a day, 7 days a week, 365 days a year. CyRide can utilize this service to call and access an interpreter if/when this need arises. CyRide would utilize this service mostly for requests when passengers come into the office but could also utilize it for public meetings or if a supervisor were called out to assist a passenger in getting from point A to point B and had communications issues. According to CyRide policy, drivers cannot utilize cell phones while driving their shift. But, they could request help from a supervisor that could utilize these over the phone Interpretive Services if needed. CyRide would log these instances within the LEP log. Only one instance has occurred since this service has been instituted for a cost of under \$3.00.
- **Google Translate on CyRide website (free)** - CyRide has modified its website to allow Google Translate on its pages so that customers can view the information CyRide provides in html in their native language of choice. Not only can customers translate their information but they can then print their pages to obtain a hard copy within their own preferred language. Efforts will strive to provide information in html as opposed to making picture copies of reports to allow all documents, forms, information be accessible to everyone regardless of nationality or disability. Therefore all written materials in html code (schedules, timetables, detours, alerts, what's new information,

ADA applications, Title VI complaint process etc.) would be provided in alternative languages through Google translate. Ames' human service agencies have welcomed this feature as they can access the information for their clientele within their language at a click of a button to translate CyRide's services and provide a printed copy.

- **Font Size Increase/Decrease on CyRide website (free)** –CyRide's website is able to be printed/viewed in several different size of fonts. Several years ago, CyRide has translated the schedule/timetable to Braille for a customer in the past upon request. This request was approved and completed for the customer. Another accommodation was also made for a visually impaired passenger requesting a larger print timetable. Staff accommodated and printed off a new bigger timetable according to what size of print the passenger needed to see the print. No other requests to translate CyRide's Schedule/Timetables into Braille have been made to CyRide in recent years. CyRide believes this translation is now a minimum since smart phones have opened up new communication for the visually impaired.
- **Facebook/Twitter (free)** CyRide communicates all changes in services, routes, detours, stops, emergencies on its Facebook and Twitter accounts. Anyone that "likes" CyRide's Facebook page can translate their Facebook account. Twitter allows language translation but is more limited on the quantity of languages allowed (Italian, Spanish, English French, German, Japanese). However the postings from CyRide are still in English as posted, which is a limitation of these two programs. For any postings, however; passengers can click on the link taking them back to CyRide's website where the information could then be translated through the html via Google Translate. CyRide has over 2,900 fans on Facebook and nearly 1,500 followers on Twitter.
- **Online Videos/DVD (free)** – CyRide staff has developed two videos instructing the public on "How to Ride CyRide" and "How to Read CyRide's Schedule". CyRide has these available on their website and has also distributed these videos to human/health service agencies to play for their clients. In addition, these videos have been released on the City of Ames' public television access channel. This would be a great resource for those with vision disabilities.
- **Schedules (free)** – CyRide provides its printed schedule in English format as well as on the website. Many years ago, CyRide has utilized a local company in the past to translate schedules from English to Braille and a large print type timetable for a visually impaired person. The cost for the Braille timetable was fairly reasonable rate for translation fees. Braille was also implemented on CyRide's schedule tubes throughout campus per a visually impaired person's request. This enabled the individual to identify their particular location in reference to CyRide's routes. In today's technological world, computers have opened up a new world for the visually impaired as text can be read verbally through programs for the visually impaired. Email, Facebook and Twitter have also helped the deaf and visually impaired communities as many individuals now have smart phones enabling them to access information more readily. CyRide's supervisors work with our visually impaired passengers to have them added to CyRide's e-mail notification listing, Facebook or Twitter. CyRide redesigned their website in August 2011 which now allows translations to readily occur on the site as needed in a multitude of languages.

- **Use of English Printed Schedules Only 2%** - Of the nearly 6 million passenger trips transported a year, only 100,000 CyRide Route Timetable/Map brochures are printed in English in any given year for fall and summer service. **Therefore, less than 2% (100,000/5,749,038 passengers = 1.7%) of CyRide's riders actually utilize the published map currently printed in English.** Additionally, CyRide typically has maps leftover at the end of each service period. This indicates that the majority of passengers receive their information on CyRide's website.
- **Translation Fee for Schedules (\$16,265/year)**- CyRide located a business in Des Moines that could translate CyRide's schedules into a printable format and this would perhaps be more accurate than Google Translate on the website. The [Iowa International Center](http://iowainternationalcenter.org/) (<http://iowainternationalcenter.org/>) located in Des Moines, Iowa offers translation services at **\$65/hour**. CyRide contacted an Iowa International Center representative and it would take approximately 80 hours for this document to be translated. With a Chinese language, more paper would be needed to expand the layout of the system route map, timetables and information. Assuming the cost is \$65/hour * 80 hours, the cost to translate the document would be \$5,200 per translation for a translation in Microsoft Word. An Illustrator document that requires manipulation of maps and graphics would most likely cost double the translation cost. In addition, English maps cost \$.35 to print per map for a high quantity of 100,000. This cost would double if less are needed with more space to print Chinese symbols. Only one language, Chinese Mandarin, would be needed if Chinese's LEP group ever were over 1,000 in population costing **\$16,265** (((\$5,200 * 1 languages* 2 times/year per each schedule change) + (\$0.60/map print * 2,444 Chinese population over 5 years of age estimated in 2014* 4 maps/person). While this cost is minimal in being approximately 0.8% of CyRide's federal operating apportionment (\$16,265/\$2 M.), if only 2% of the Chinese population are utilizing schedules similar to all CyRide passengers and utilizing the website instead, this printing would not be the best use of CyRide's resources. Additionally, the majority of the Chinese LEP population speaks English "well" per the

Most of the Ames population of 58,938 is a highly educated community with **only 3.7% not graduating high school** that are over the age of 25. **The remaining 29,887 students (1/2 of Ames' population) attending Iowa State University in the Fall 2012 are attending college and the web is a main source of communication for educated young people.** Most students and the educated Ames public request online information on the web and now through mobile phone devices. Two applications have been made by students in the past few years and then published to iTunes to download. Therefore, in CyRide's opinion the web and mobile usage are more important features to communicate alternative languages than printed materials to the LEP population. CyRide is looking to provide GIS features for passengers in the near future.

- **Printing Urgency** - The time factor and urgency to translate the maps by the required deadline would be CyRide's biggest concern if/when the Safe Harbor

Threshold were met. CyRide has an administrative staff of only six individuals whom are always working against a deadline to change the English version timetables making final printing of the document at the last possible moment to disseminate to the public. The individual that creates the schedules for run-pick is also the person that develops the printed schedule for the public as well as on the website. Translation to alternative languages would then require additional time to translate and print. Without additional staff being added to CyRide, alternative language versions could NOT be accommodated and made available by the start of fall and summer service each year. If alternative languages are required to be published in a printed form by FTA, then CyRide would need to hire another full time person to help with fall run pick and coordination of the route map printing as currently one person completes both duties. In addition, the cost to translate and print maps would likely increase greatly with a short turn-around fee.

- **Staff Resources (free)** - CyRide does not have any supervisory staff fluent in other languages but English. However, CyRide has utilized drivers or interns fluent in Chinese to translate materials into CyRide's most utilized non-English languages as a "value added service" within the community. These employees have created advertising flyers for public meetings for a potential fare increase, which were then posted in Asian Grocery stores and sent out via social media. These CyRide employees translated the materials and verified the information was correct prior to posting. This flyer was then posted on Facebook by a CyRide customer that CyRide is now translating information in Chinese by a follower therefore this method was considered a success! CyRide also had several Asian minorities in attendance at that public meeting.

This method of posting critical information at Asian grocery stores was also utilized when deploying CyRide's new service for real-time schedule information called NEXT BUS in February 2013. The translation took approximately a week to develop and therefore this resource could only be utilized for planned outreach to LEP persons. In addition, employees have developed surveys to distribute to Asian churches to ensure the LEP community could utilize the new NEXT BUS program and attain bus service.

Overall, CyRide has had driving staff fluent in Chinese, German, French and Spanish at the time of an employee survey. Keep in mind that CyRide hires/retrains over half of its drivers during the course of a year so the availability of having drivers fluent in a given language can fluctuate throughout the year.

Four Factor Conclusion

Based on the above data, outreach and communications within the Ames community, CyRide believes there is a Chinese LEP population towards Mandarin Chinese language per the American Community Survey estimates. However, we also believe that Chinese speak and understand

English well which is still “less than very well”. CyRide is required to provide vital documents in Mandarin Chinese to ensure that we are providing services to this population.

there is not any specific language that meets the Safe Harbor Threshold of 1,000 persons or 5% of the Ames’ population. Therefore, CyRide is not required to provide any printed materials in languages other than English. CyRide will continue to evaluate, monitor and provide outreach to LEP groups to provide meaningful access to our services and programs.

Limited English Proficiency (LEP) Plan

The Federal Transit Administration (FTA) requires all recipients of federal funding develop a language assistance plan in order to ensure they are providing meaningful access to their services, programs and activities. This plan is CyRide’s effort to describe their compliance with FTA’s Circular 4702.1B.

1) Four Factor Analysis Summary Results

As determined through the factor one of the four-factor analysis, CyRide has determined that it does not have an LEP population over 5% or 1,000 persons in a particular language group as defined under the Department of Justices’ Safe Harbor Provision which was also adopted by the Department of Transportation. The largest number of persons by language speaking English less than very well within Ames are those individuals speaking Chinese as evidenced by the most recent available data from the 2007-2011 American Community Survey 5-year Estimates for the City of Ames.

Language	Speak language at home	Speak English “very well”	Speak English less than “very well”	Percentage speaking English less than very well
Total Ames’ Population 5 years and over	55,534			
Speak English only	49,505			
Chinese	1,972	1,077	895	1.6%
Korean	426	186	240	0.4%
Spanish	1,083	911	172	0.3%
Other Asian languages	453	373	80	0.1%

Source: 2007-2011 American Community Survey 5-year Estimates for the City of

Ames: http://factfinder2.census.gov/faces/tableservices/jsf/pages/productview.xhtml?pid=ACS_11_5YR_B16001&prodType=table

Furthermore, CyRide underwent additional outreach to identify any significant number of non-ISU student LEP Chinese populations within the Ames metropolitan area over 1,000 persons. Only three specific LEP groups have been found through CyRide’s outreach, previously discussed within the four factor analysis, within Ames including: English Language Learners (140), Intensive English Orientation Program (90) and Engaging International Spouses (30). Specifically, the Ames School District only works with approximately 140 English Language Learners with students in Kindergarten through 12th grade. Even if all 140 students also had LEP parents, that would only constitute 240 LEP persons and these persons would have different languages. In the fall 2012, Iowa State had only 90 students enrolled within the Intensive English Orientation Program (IEOP) to prepare those particular students, mainly Chinese students, for university

coursework taught in English. This information is not readily available yet for fall 2013. Specifically, the IEOP representative indicated that IEOP students are in Ames to achieve a higher education from Iowa State, which teaches all of their coursework in English. Students need to know English “very well” by the time they enter Iowa State University according to IEOP staff. Therefore, CyRide is interpreting that IEOP students would be considered LEP persons but any ISU student enrolled in regular university coursework would be required to speak/write English very well otherwise, they will not success with their coursework. Lastly, CyRide has found an Engaging International Spouses (EIS) group of approximately 30 individuals, which could be considered LEP since they meet bi-monthly to work on English skills. However, there are many different languages spoken within this EIS group. Adding these groups up is less than the 1,000 required

Therefore, since CyRide staff cannot absolutely determine a LEP population in any given language over the 1,000 or 5% Safe Harbor Provision, translating vital documents into other languages is not required at this time. However, CyRide will continue to monitor, evaluate and provide outreach to LEP persons of any given language in the Ames metropolitan area.

2) How CyRide Provides Language Assistance

CyRide has instituted the following measures to work with LEP persons that need language assistance. As CyRide has not defined any particular LEP population over 1,000 persons, this language assistance is for all languages in general. If and when LEP populations can be documented over the 1,000 Safe Harbor Threshold, CyRide will then put forth efforts to provide vital documents in that given language.

Survey Translation

Future surveys administered by CyRide will be available in Chinese.

Website Translation

Google Translate has been implemented on CyRide’s website and available to anyone to click a drop down button to change the language on the site to their preferred language. CyRide’s website can translate all forms and vital documents, which includes at a minimum:

1. CyRide Contact Information
2. CyRide policies and transit services on CyRide’s website
 - a. Route/timetable information
 - b. Fare Information
 - c. Pass Sales Outlets Locations
 - d. Detours & Alerts information will be disseminated on CyRide’s bilingual website
 - e. ADA Accessible Services Information
 - f. ADA Complimentary Paratransit Application Form
 - g. Outside Ames Transportation (Airport Shuttle, Regional Intercity Buses, Service

- to University of Iowa City Hospitals & Clinics, Story County Public Transit Service)
- h. Title VI Complaint Procedures
- i. Title VI Complaint Form
- j. Reasonable Accommodation information

Interpretive Services

CyRide staff first identifies LEP persons who may need language assistance. CyRide staff will examine records to see if requests for language assistance have been received in the past, either at meetings or over the phone, to determine whether language assistance might be needed at future events or meetings. CyRide staff will also greet participants as they arrive at a CyRide sponsored event such as a public meeting. By informally engaging participants in conversation it is possible to gauge each attendee's ability to speak and understand English. Additionally, public meetings will often require the person to sign in and therefore this information could be more easily attained. CyRide can also determine the language of LEP individuals requesting information at CyRide's offices, CyRide public meetings or on-route by transit supervisor with ["I speak cards."](#) If additional time is needed to work with a passenger, it is CyRide's policy to call out a supervisor to help communicate with the LEP person. Drivers would then be free to continue service for the remaining passengers.

If interpretive services are needed, the following mechanisms are utilized.

1. Interpreter Services: An interpreter will be called for assistance via "CTS Language Link" 24/7/365 phone service as needed if confusion arises between a LEP person and CyRide staff. This will most frequently be used in-office where telephones are available but could also be utilized by a supervisor out on route if requested by a driver to assist with an LEP passenger if a cell phone was available. Any utilization of an interpreter will be documented within CyRide's Title VI frequency of contact log.
2. I Speak Cards: CyRide will determine language of LEP individuals requesting information at CyRide's offices, CyRide public meetings or on-route by transit supervisor with ["I speak cards."](#) Unfortunately, CyRide bus operators will not typically be able to stop and assist the customer and will call a mobile supervisor for assistance. Any utilization of an interpreter or I speak cards will be documented within CyRide's Title VI frequency of contact log.
3. Picture Graphics: CyRide's Lost and Found Department implemented a graphic picture system with many lost items photo/words identified in other languages (Chinese, Korean, Spanish, etc) staff may have encountered.
4. Public Notice of Interpreter Services: Placement of statement in public meeting notices that interpreter services are available for meetings, within a 72 hour advance notice. The City of Ames' has indicated that the City Clerk would obtain interpretive services if requested given 72 hours notice. Any utilization of an interpreter will be documented within CyRide's Title VI frequency of contact log.
- 5.

Verbal Dissemination of CyRide Services via public television stations

CyRide has instituted English public service announcements (How to Ride video, How to Read a Schedule video, etc) on the [City Channel 12](#) and [ISU Channel 18](#) that could inform LEP individuals of how to access CyRide bus information. This would help eliminate barriers to those individuals that have trouble reading English but not necessarily understanding English verbally. Several Human Service Agencies indicate that some LEP persons understand English verbally over a written brochure in many cases. Additionally these videos have been dispersed out to health/human service agencies serving minority/LEP populations to display within their organization that may need assistance with transit services.

3) Notice of Availability of Language Assistance

CyRide's LEP Plan documenting the availability of language assistance is available on CyRide's website at www.cyride.com/CivilRights, periodically on CyRide's buses behind the drivers where notices are typically displayed and on CyRide's reception desk. This notice would be removed/covered over if other notices of importance need to be displayed.

The LEP plan will also be available through the annual Passenger Transportation Plan (PTP) update effort as required by the Iowa Department of Transportation. As a result, the LEP will be dispersed to all transportation providers and human service agencies participating in the PTP process. Any person or agency may request a digital/written copy of the LEP Plan via telephone, fax, mail or in person. LEP individuals may request copies of the Plan in alternative languages from CyRide or may download the plan themselves in English and translate via Google Translate.

4) Monitoring, Evaluating and Updating the LEP Plan

CyRide's LEP Plan will be reviewed and updated every three years through the Title VI Program Update, when new American Community Survey numbers are available as well as periodically through the coordinated human services- transit provider plan process (AAMPO's Passenger Transportation Plan Update) as required by the Iowa Department of Transportation. Specifically, CyRide will continue to conduct the following efforts towards to provide meaningful access to LEP persons within the Ames community.

Limited English Proficient Persons Documentation

- a. **American Community Survey** - CyRide will continue to periodically evaluate the LEP population by language as defined by the ACS via the U.S. Census. Once there is any significant concentration of LEP persons not speaking English very well over the 1,000 person threshold, CyRide will work to update its plan to provide written vital documents in that particular LEP language(s).

- b. **Documentation of LEP Contact** - CyRide will document the LEP individuals served each year and determine their preferred national language if communication in English is a barrier or limitation to receiving CyRide services. This includes instances, connections, occurrences between LEP persons and CyRide staff including clerks (phone/general e-mail staff), dispatchers and supervisors. Based upon this list, senior staff will review to determine if language assistance may be improved or if any internal procedural changes are necessary to ensure all CyRide programs, services or activities are accessible to LEP persons.
- c. **Number of types of language assistance related complaints**
- d. **Changes in the frequency of contact with specific languages by staff**

Networking/Outreach

- a. **LEP Groups** – Continue seeking opportunities to provide information on CyRide’s service to Limited English Speaking groups such as Engaging International Spouses, etc.
- b. **Human Service Organizations** - Network with local human service organizations (Story County Human Service Council and United Way’s Transportation Collaboration Committee) that provide services to LEP individuals; seek input regarding the coordinated human service/transportation provider plan (Passenger Transportation Plan) , which is the first public input for transportation projects prior to being placed in the Transportation Improvement Plan or Work Program.
- c. **International Students & Scholars (ISS) and Intensive English Orientation Program (IEOP) Coordination** – CyRide will continue working with the International Student & Scholars representatives and IEOP Department to address LEP needs. This office is the expert within the community working with the international student population and LEP population. They are the experts on communicating with this population segment.
- d. **Orientation Services:** CyRide will work with ISS to be available for their fall/spring/summer orientation sessions to describe CyRide’s services.

Surveys

- a. Drivers, mechanics and administrative staff will be surveyed as needed at their spring meeting, if held, for their alternative language skills to determine language resources available within CyRide’s organization. Their experience with LEP persons during the previous year will also be analyzed.
- b. Surveys to passengers/public will request minority and low-income information demographics to detail needs by these particular groups. CyRide has requested that the City of Ames place this vital information within their City Residential Satisfaction survey for future surveys.

Since the last Title VI Submission the following data has been compiled:

1. **Number of LEP person contacts documented** – 13
2. **Use of interpretive over the phone language services** – 1

3. **Determination if interpretative services have been effective and sufficient to meet the needs** - Language interpretative services have only been used once in the past three years since it has become available. CyRide believes this service to be useful to staff especially internally in the office with the knowledge that it can help if needed. Communication with CyRide's front desk clerk indicates that the resources for these interpretative services, while not utilized often, is effective and sufficient to meet her needs if there is a situation where she cannot communicate with a person in English. Additionally, she communicated that the "I speak" cards and picture graphic cards for lost & found are also great resources for this position. Additionally, drivers are instructed to call CyRide Dispatch if they have difficulty with LEP person en-route. Without much utilization of the services, CyRide did not ask the LEP population if these services were sufficient for their needs as they are not utilized much. Perhaps after fully advertising these services, the over the phone services may be utilized more.
4. **Determine if CyRide has fully complied with the goals of the LEP plan.** CyRide believes it has fully complied with the goals of the previous LEP Plan. With the new Title VI regulations published in October 2012, CyRide needed to update its full plan. That plan requires that CyRide publicize its interpretive services to LEP persons. Therefore, CyRide will begin publicizing that interpretive services are available at CyRide's offices, website and buses with the adoption of its 2013 LEP plan.
5. **Determine if complaints have been received concerning CyRide's failure to meet the needs of LEP individuals.** There have been no complaints from LEP individuals over the past three years.

5) Staff Training

The following training will be provided to CyRide staff:

- a. Dissemination of CyRide's Title VI complaint procedures are provided within CyRide's Driver manual. CyRide employees are also provided a copy of the Title VI Program and LEP Plan on an annual basis. Annually, Operations staff (front desk, Dispatch, CyRide Secretary, Operations Supervisor and Assistant Director for Operations) would discuss how CyRide handles LEP complaints by following documented Title VI procedures as well as within management meetings to ensure procedures are followed. CyRide will also periodically provide information to drivers on Title VI procedures within CyRide's employee newsletter, Signals.
- b. LEP awareness training is currently included in incoming driver training to employees in how to communicate with our LEP population as well as procedures if difficulties with communication arise. Internal CyRide staff is then trained on how to utilize the Interpretive Language Services available to help passengers.
- c. LEP instances on the bus and in the office (email, phone, and letter) and requests for interpretive services through public meetings would be documented. How to log these requests would be communicated to all CyRide staff. Any instances and requests for interpretive services would be filed with Assistant Director for Operations as a Title VI request and documented on a fiscal year basis.

Questions or comments regarding the LEP Plan may be submitted to:

CyRide
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